

UNDER SEAL

FILED 11 MAR 02 16:41 USDC-ORP

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

Case No. 11-cr- 102-RE

v.

INDICTMENT

**JARED DANIEL RILEY,
ELYZABETH MORGAN LEITNER,
and JOSELLE K. BAUTISTA,**

**21 U.S.C. §§ 841(a)(1), (b)(1)(C),
846, 843(a)(3) and 853;
18 U.S.C. §§ 371, 1028(a)(3) and (b)(3)(A)**

Defendants.

FILED UNDER SEAL

THE GRAND JURY CHARGES:

COUNT 1

(Conspiracy to Possess with Intent to Distribute Oxycodone)

Beginning at a time unknown to the grand jury, but at least by March of 2010, and continuing through the date of this indictment, in the District of Oregon and elsewhere, **JARED DANIEL RILEY, ELYZABETH MORGAN LEITNER and JOSELLE K. BAUTISTA**, defendants herein, did knowingly and willfully combine, conspire, confederate, and agree with persons whose identities are known and unknown to the grand jury to distribute and possess with intent to distribute oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C), and 846.

COUNT 2

(Possession with Intent to Distribute Oxycodone)

On or about May 22, 2010, in the District of Oregon, **JARED DANIEL RILEY**, defendant herein, did knowingly and willfully possess with intent to distribute oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 3

(Possession with Intent to Distribute Oxycodone)

On or about May 23, 2010, in the District of Oregon, **ELYZABETH MORGAN LEITNER**, defendant herein, did knowingly and willfully possess with intent to distribute oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 4

(Possession with Intent to Distribute Oxycodone)

On or about May 23, 2010, in the District of Oregon, **JOSELLE K. BAUTISTA**, defendant herein, did knowingly and willfully possess with intent to distribute oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 5

(Possession with Intent to Distribute Oxycodone)

On or about May 24, 2010, in the District of Oregon, **JOSELLE K. BAUTISTA**, defendant herein, did knowingly and willfully possess with intent to distribute oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 6

(Attempt to Obtain a Controlled Substance by Fraud)

On or about May 22, 2010, in the District of Oregon, **JARED DANIEL RILEY** and **ELYZABETH MORGAN LEITNER**, defendants herein, did knowingly and intentionally attempt to obtain oxycodone, a Schedule II controlled substance, by misrepresentation and fraud, in violation of Title 21, United States Code, Section 843(a)(3).

COUNT 7

(Attempt to Obtain a Controlled Substance by Fraud)

On or about May 24, 2010, in the District of Oregon, **JOSELLE K. BAUTISTA**, defendant herein, did knowingly and intentionally attempt to obtain oxycodone, a Schedule II controlled substance, by misrepresentation and fraud, in violation of Title 21, United States Code, Section 843(a)(3).

COUNT 8

(Obtaining a Controlled Substance by Fraud)

On or about May 22, 2010, in the District of Oregon, **JARED DANIEL RILEY** and **ELYZABETH MORGAN LEITNER**, defendants herein, did knowingly and intentionally obtain oxycodone, a Schedule II controlled substance, by misrepresentation and fraud, in violation of Title 21, United States Code, Section 843(a)(3).

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COUNT 9
(Obtaining a Controlled Substance by Fraud)

On or about May 23, 2010, in the District of Oregon, **ELIZABETH MORGAN LEITNER**, defendant herein, did knowingly and intentionally obtain oxycodone, a Schedule II controlled substance, by misrepresentation and fraud, in violation of Title 21, United States Code, Section 843(a)(3).

COUNT 10
(Obtaining a Controlled Substance by Fraud)

On or about May 23, 2010, in the District of Oregon, **JOSELLE K. BAUTISTA**, defendant herein, did knowingly and intentionally obtain oxycodone, a Schedule II controlled substance, by misrepresentation and fraud, in violation of Title 21, United States Code, Section 843(a)(3).

COUNT 11
(Obtaining a Controlled Substance by Fraud)

On or about May 24, 2010, in the District of Oregon, **JOSELLE K. BAUTISTA**, defendant herein, did knowingly and intentionally obtain oxycodone, a Schedule II controlled substance, by misrepresentation and fraud, in violation of Title 21, United States Code, Section 843(a)(3).

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COUNT 12

(Conspiracy to Possess with Intent to Use Five or More Identification Documents)

On or about May 25, 2010, in the District of Oregon, **JARED DANIEL RILEY**, **ELYZABETH MORGAN LEITNER** and **JOSELLE K. BAUTISTA**, defendants herein, did knowingly and willfully combine, conspire, confederate, and agree with persons whose identities are known and unknown to the grand jury to possess with intent to use unlawfully five or more false identification documents that were in or affected interstate or foreign commerce, to wit: eleven counterfeit Michigan driver's licenses bearing the photograph of defendant **JOSELLE K. BAUTISTA** to be used to facilitate a drug trafficking crime, in violation of Title 18, United States Code, Sections 371, 1028(a)(3), and (b)(3)(A).

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Criminal Forfeiture - Drug Offenses

Upon conviction of a controlled substance offense(s) listed above, **JARED DANIEL RILEY, ELYZABETH MORGAN LEITNER and JOSELLE K. BAUTISTA**, defendants herein, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations.

Dated this 2 day of March 2011.

A TRUE BILL.

~~OFFICIATING~~ FOREPERSON

Presented by:

DWIGHT C. HOLTON, OSB #09054
United States Attorney
District of Oregon



PAMALA R. HOLSINGER, OSB #89263
Assistant United States Attorney